

1 Chief Judge Ricardo S. Martinez  
2  
3  
4  
5  
6  
7  
8  
9

10 UNITED STATES DISTRICT COURT FOR THE  
11 WESTERN DISTRICT OF WASHINGTON  
12 AT SEATTLE  
13  
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.  
18

HUAWEI DEVICE CO., LTD., and  
19 HUAWEI DEVICE USA, INC.,

20 Defendants.

21 NO. CR19-0010RSM  
22  
23 GOVERNMENT'S MOTION TO SEAL  
24 OPPOSITION TO DEFENDANTS'  
25 MOTION TO DISMISS COUNT TEN  
26  
27  
28

**NOTED:** August 30, 2019

The United States of America, by and through Tessa M. Gorman, First Assistant United States Attorney for the Western District of Washington (Acting Under Authority Conferred by 28 U.S.C. § 515), and Todd Greenberg, Thomas Woods, and Siddharth Velamoor, Assistant United States Attorneys for said District, hereby files this Motion to Seal its Opposition to Defendants' Motion to Dismiss Count Ten for Failure to State an Offense and Lack of Specificity (the "Response"). Portions of the Response, as well as the two exhibits attached to the Response, refer to material that is already under seal or is otherwise subject to the Protective Order in this case (Dkt. 48).

The United States will contemporaneously file an unsealed version of its Response with the sensitive material redacted.

DATED this 22<sup>nd</sup> day of August, 2019.

Respectfully submitted,

TESSA M. GORMAN  
First Assistant United States Attorney  
(Acting Under Authority Conferred by  
28 U.S.C. § 515)

/s/ Siddharth Velamoor

TODD GREENBERG  
THOMAS WOODS  
SIDDHARTH VELAMOOR  
Assistant United States Attorneys  
700 Stewart Street, Suite 5220  
Seattle, WA 98101-1271

**MOTION TO SEAL**  
*U.S. v. Huawei Device Co., Ltd., et al. (CR19-010RSM) - 2*

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s).

/s/ Kylie Noble  
KYLIE NOBLE  
Legal Assistant  
United States Attorney's Office  
700 Stewart Street, Suite 5220  
Seattle, WA 98101-3903  
Telephone: (206) 553-2520  
Fax: (206) 553-4440  
E-mail: kylie.noble@usdoj.gov

**MOTION TO SEAL**  
*U.S. v. Huawei Device Co., Ltd., et al. (CR19-010RSM) - 3*

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1 Chief Judge Ricardo S. Martinez  
2  
3  
4  
5  
6  
7  
8  
9

10 UNITED STATES DISTRICT COURT FOR THE  
11 WESTERN DISTRICT OF WASHINGTON  
12 AT SEATTLE  
13  
14

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.  
18

HUAWEI DEVICE CO., LTD., and  
19 HUAWEI DEVICE USA, INC.,  
20

Defendants.

NO. CR19-0010RSM

[PROPOSED] ORDER GRANTING  
MOTION TO SEAL GOVERNMENT'S  
OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS COUNT TEN

Having reviewed the United States' Motion to Seal, and due to the sensitive information contained in the United States' Opposition to Defendants' Motion to Dismiss Count Ten (the "Response"), the Court hereby ORDERS as follows:

//

//

The Government's Response, as well as Exhibits A and B attached thereto, shall be filed under seal, and shall remain sealed absent further order of the Court.

DATED this \_\_\_\_\_ day of August, 2019.

---

**RICARDO S. MARTINEZ**  
Chief United States District Judge

**Presented by:**

/s/ Siddharth Velamoor  
TODD GREENBERG  
THOMAS WOODS  
SIDDHARTH VELAMOOR  
Assistant United States Attorneys  
700 Stewart Street, Suite 5220  
Seattle, WA 98101-1271